



**CONESTOGA-ROVERS
& ASSOCIATES**

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March 2, 2012

Reference No. 056394

Ms. Sheila Desai
Remedial Project Manager
U.S. Environmental Protection Agency – Region V
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Dear Ms. Desai:

Re: Alternate Submittal Date Request
U.S. EPA's Comments on Remedial Investigation Report
Former Plainwell, Inc. Mill Property Operable Unit No. 7
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo County

Conestoga-Rovers & Associates (CRA) has prepared this letter, on behalf of the Weyerhaeuser Company (Weyerhaeuser), requesting an extension to the 30-day timeframe for submittal of a revised Remedial Investigation (RI) Report for the Former Plainwell, Inc. Mill Property Operable Unit No. 7 located in Plainwell, Michigan (Site). The RI Report was submitted to the U.S. EPA on June 20, 2011 with subsequent discussions between Weyerhaeuser, CRA, U.S. EPA, Michigan Department of Environmental Quality (MDEQ) and consultant representatives of the U.S. EPA and MDEQ occurring on September 28 and October 28, 2011 regarding initial comments on the RI Report and in particular, the Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA) portions of the report. Based on these discussions, a memorandum, entitled *Proposed Modifications to Human Health and Ecological Risk Assessments, Remedial Investigation Report, Former Plainwell, Inc. Mill Property, Plainwell, Michigan* was submitted to the U.S. EPA on November 9, 2011. On November 23, 2011, the U.S. EPA provided comments on the HHRA and Screening Level Ecological Risk Assessment (SLERA) portions of the RI Report. On February 28, 2011, Weyerhaeuser received U.S. EPA's February 17, 2011 comments on the RI Report, which indicated that the RI Report was disapproved and that Weyerhaeuser had 30 days to submit a revised RI Report, consistent with the comments provided.

Therefore, as discussed during our conversation on March 1, 2012, Weyerhaeuser is requesting an extension to this reporting date until April 20, 2012 due to the scope and breadth of the comments received, and the time required to adequately address the aforementioned comments. Moreover, CRA will only submit one hard copy of the revised document to the U.S. EPA with an electronic copy. CRA will also provide a "track changes" version of the text to facilitate review of the revised document.

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- 2 -

Should you have any questions or require any additional information, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

GAC/JQ/ds/5/Kal.

Encl.

cc: Paul Bucholtz (MDEQ) – electronic only
Jim Saric (U.S. EPA) – electronic only
Leslie Kirby-Miles (U.S. EPA) – electronic only
Erik Wilson (City of Plainwell) – electronic only
Richard Gay (Weyerhaeuser) – electronic only
Joe Jackowski (Weyerhaeuser) – electronic only
Martin Lebo (Weyerhaeuser) – electronic only
Michael Erickson (Arcadis) – electronic only
Dawn Penniman (Arcadis) – electronic only
Garry Griffith (Georgia-Pacific, LLC) – electronic only
Jeffrey Lifka (Tetra Tech) – electronic only
Jennifer Quigley (CRA) – electronic only